



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

JUN 30 2016

Mr. Brenner Munger, Ph.D., P.E.  
Manager, Environmental Department  
Hawaiian Electric  
PO Box 2750  
Honolulu, Hawaii 96840-0001

Dear Mr. Munger:

Thank you for submitting the *Draft Final Work Plan, Interim Remedial Measure at Generating Unit 6 Auxiliary Transformer Hawaiian Electric Waiau Generating Station* dated February 2016 (2016 Workplan) for Hawaiian Electric Company (HECO). CH2M Hill prepared this plan on your behalf. The 2016 Workplan is a remedial action to address environmental impacts by excavating, disposing and cleaning portions of the auxiliary transformer containment area of Generating Unit 6 contaminated with polychlorinated biphenyls (PCBs) at Waiau Generating Station located at 475 Kamehameha Highway in Pearl City, Hawaii.

This letter serves as the U.S. Environmental Protection Agency Region 9's (EPA's) conditional approval (Approval) of only the auxiliary transformer containment area of Generating Unit 6 (Site). This Approval does not apply to other areas of the Waiau Generating Station property. A detailed description and definition of the Site boundary is included below. EPA is issuing this Approval under the Toxic Substances Control Act (TSCA) PCB regulations in 40 Code of Federal Regulations (CFR) 761.61(a) and 761.61(c). The conditions of approval are also below.

The Site is located in the central portion of the HECO Waiau Generating Station. The border of the Site is a concrete containment wall system that extends approximately 24 feet in the east-west direction and 34 feet in the north-south direction. The auxiliary transformer is located within this concrete containment wall footprint, and rock fill is placed on top of backfill within the containment wall system. See Figures 1-1 and 2-1 in the enclosure to this letter for maps and illustrations of the Site.

The 2016 Workplan proposes to excavate and dispose of some rock fill or backfill impacted with elevated concentrations of PCBs. After discussions with HECO representatives, the cleanup goals for this action were revised to reflect the goals in EPA's conditions of approval.

As stated in the 2016 Workplan, residual contamination potentially remaining in the subsurface soil after fill and soil have been removed to the maximum extent possible will be addressed as part of an ongoing facility-wide assessment. After excavation and removal of contaminated materials the containment area will be backfilled with clean 3B-Coarse aggregate to match pre-existing conditions. EPA has determined that implementation of the 2016 Workplan as modified by this Approval will not result in an unreasonable risk of injury to health or the environment.



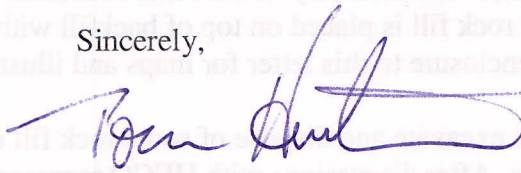
### EPA's Conditions of Approval

1. **Implementation of the 2016 Workplan:** The Site owner and its consultants must implement the 2016 Workplan as modified by the conditions in this Approval.
2. **Written Certification:** At least fourteen (14) calendar days prior to initiating cleanup activities at the Site submit the written certification required in 761.61(a)(3)(i)(E). The certification must be signed by the property owner and the cleanup party.
3. **Cleanup Goals:**
  - Soil
    - a. PCB Concentration in soil <25 mg/kg:
    - b. Site will be marked with a PCB M<sub>L</sub> mark placed in a visible location
  - Concrete
    - a. All accessible concrete will be superficially surface cleaned, and dried for 24 hours per 40 CFR 730(p)(ii).
    - b. Accessible concrete will be sealed and marked with PCB M<sub>L</sub> as in 40 CFR 730(p)(iii).
4. **Decontamination of tools, sampling equipment, and movable equipment; and disposal of decontamination wastes:** Decontamination and waste disposal must be conducted consistent with applicable requirements in 40 CFR 761.79.
5. **Removal Action Workplan Completion Report (RAWCR):** Within 60 days after completion of cleanup field activities HECO shall submit a RAWCR to EPA for review and approval.

This Approval does not relieve HECO and its consultants from complying with other applicable TSCA PCB and Federal regulations, and state and local regulations and permits. Departure from this Approval without prior written permission from EPA may result in revocation of this Approval. If additional information demonstrates that EPA can no longer make a no unreasonable risk determination, EPA will modify or revoke this Approval.

We look forward to assisting you and your consultants on PCB matters associated with HECO Waiau Generating Station in Pearl City, Hawaii. If you have questions concerning this Approval, please call Omer Shalev at (415) 972-3538 or send correspondence to [shalev.omer@epa.gov](mailto:shalev.omer@epa.gov).

Sincerely,



for Jeff Scott  
Director  
Land Division

### Enclosure

CC: Melody Calisay, Hawaii Department of Health (via email)  
Roger Brewer, Hawaii Department of Health (via email)  
Wray Kakugawa, HECO (via email)  
Bill Allen, HECO (via email)